

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MICK ROCK, : 17 Civ. 2618 (ALC)

Plaintiff, :

-against- : **DECLARATION OF C.**
 : **LINNA CHEN IN SUPPORT**
ENFANTS RICHES DEPRIMES, LLC : **OF BILL OF COSTS**
BARNEYS NEW YORK, INC. and THE :
REALREAL, INC., :

Defendants.
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I, **C. LINNA CHEN**, hereby declare, under penalties of perjury, that the following statements are true and correct:

1. I am a partner of Loeb & Loeb LLP, counsel for defendants Enfants Riches Deprimes, LLC Barneys New York, Inc. (“Defendants”). I have personal knowledge of the facts set forth herein and respectfully submit this declaration in support of Defendants’ Bill of Costs.

2. I attest that the Bill of Costs and supporting itemization and documentation for the submitted costs are true and correct and were necessarily incurred in the case.

3. Attached hereto as Exhibit A is a true and correct copy of an invoice for the deposition transcript of Mick Rock, necessarily obtained for use in the case.

4. Attached hereto as Exhibit B are true and correct copies of costs for making copies of any materials where the copies are necessarily obtained for use in the case.

5. Attached hereto as Exhibit C is a true and correct copy of an invoice for charges related to the retrieval of documents from the U.S. Copyright Office, for documents necessarily obtained for use in the case.

6. Attached hereto as Exhibit D are true and correct copies of invoices for costs of express mail delivery, postage and courier charges necessarily incurred in the case.

7. Attached hereto as Exhibit E are true and correct copies of invoices for document retrieval charges necessarily incurred in the case.

8. Attached hereto as Exhibit F are true and correct copies of charges for electronic legal research necessarily incurred in the case.

9. Attached hereto as Exhibit G are true and correct copies of invoices for a litigation support vendor for document production purposes, necessarily incurred in the case.

10. Attached hereto as Exhibit H is a true and correct copy of an invoice for the cost of materials (album containing the allegedly infringing photograph) necessarily obtained for use in the case.

11. Attached hereto as Exhibit I is a true and correct copy of the cost of telephone charges necessarily incurred for use in the case.

12. For all the foregoing reasons, it is respectfully submitted that the costs in the Bill of Costs should be taxed in full by the Clerk of the Court.

June 29, 2020

C. Linna Chen
C. LINNA CHEN

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